

KML Law Group, P.C.  
A Professional Corporation incorporated in Pennsylvania  
216 Haddon Avenue, Suite 406  
Westmont, NJ 08108  
(215) 627-1322  
Attorneys for Nationstar Mortgage LLC d/b/a Mr. Cooper

IN THE MATTER OF:

Marcus Tse

DEBTOR(S),

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

**CHAPTER 7  
CASE NO. 19-13793 ABA**

**NOTICE OF MOTION FOR RELIEF  
FROM STAY**

TO:

Marcus Tse  
20 Hyacinth Lane  
Sicklerville, NJ 08081

Jill T. Bryan  
Bryan, Jill T.  
Law Office of Jill T. Bryan  
Washington Professional Campus,  
900 Route 168, Suite A4  
Turnersville, NJ 08012

STANGER, DOUGLAS S.  
Flaster/Greenberg  
646 Ocean Heights Avenue  
Linwood, NJ 08221

US TRUSTEE  
Office of the US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **Nationstar Mortgage LLC d/b/a Mr. Cooper**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, N.J. 08101, Courtroom 4B**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be

requested. The property involved is known as **20 Hyacinth Lane, Sicklerville NJ 08081**. The hearing on this matter is scheduled for May 21, 2019 at 10:00 a.m.

/s/ Denise Carlon, Esq.

Denise Carlon, Esquire  
Brian C. Nicholas, Esquire  
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Denise Carlon  
Attorney for Nationstar Mortgage LLC d/b/a Mr. Cooper

Dated: April 24, 2019